

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

LYNWOOD MOREAU, *et al.*

*Plaintiff,*

v.

HARRIS COUNTY, TEXAS,

*Defendant.*

§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 4:19-CV-00646

**DECLARATION OF SHAIN CARRIZAL**

1. My name is Shain Carrizal. I am over the age of 21 years and am fully competent to make this declaration. I am employed by Harris County, Texas (“Harris County”). I currently serve as the Executive Director of Human Resources & Risk Management for Harris County. All of the facts stated herein are true and correct and are based upon my personal knowledge.
2. From time to time following federally declared disasters, Harris County requests funding from the Federal Emergency Management Agency (“FEMA”).
3. One category of post-disaster funding Harris County requested and received in the past from FEMA is reimbursement for law enforcement expenses incurred because of the federally declared disaster.
4. When a Harris County Sheriffs Lieutenant performs work specifically responding to a disaster, that work may be coded in Harris County's payroll system as “2NDRATE” or “Z-Time”.
5. In order to receive reimbursements from FEMA, Harris County must submit its payroll records to FEMA. FEMA reimburses Harris County only for the expenditures Harris County actually incurred. In other words, Harris County receives funding from FEMA only for payroll and benefit expenses actually incurred.
6. Harris County did not bill FEMA time and half for work performed by the Lieutenants during the time relevant to the above-styled lawsuit.
7. Furthermore, Harris County neither requested nor received post-disaster funding from FEMA based on a time and a half rate for work performed by Lieutenants during or as a result of Hurricane Harvey.

I declare under penalty of perjury that the foregoing is true and correct.

Dated July 19, 2024



---

Shain Carrizal